

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

SUSAN SOTO PALMER, et. al.,

*Plaintiffs,*

v.

STEVEN HOBBS, et. al.,

*Defendants,*

and

JOSE TREVINO, ISMAEL CAMPOS,  
and ALEX YBARRA,

*Intervenor-Defendants.*

Case No.: 3:22-cv-05035-RSL

Judge: Robert S. Lasnik

**PLAINTIFFS' DESIGNATION  
OF EXPERTS PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 26(A)(2)(A)**

**INTRODUCTION**

Plaintiffs serves this Designation of Experts pursuant to the Scheduling Order (Dkt. # 93) in this case, and would respectfully show this Honorable Court as follows:

**I.**

**Retained Expert Witnesses**

1. Dr. Loren Collingwood  
The University of New Mexico  
Department of Political Science  
Social Sciences Building #78  
MSC 05-3070  
1 University of New Mexico  
Albuquerque, NM 87131-0001

A summary of this expert's qualifications as well as their opinions and analysis have been provided in attached report marked as Exhibit "A" which was served on all counsel of record on November 2, 2022.

2. Dr. Josué Estrada  
Central Washington University  
400 E. University Way  
Ellensburg, WA 98926

A summary of this expert's qualifications as well as their opinions and analysis have been provided in attached report marked as Exhibit "B" which was served on all counsel of record on November 2, 2022.

3. Dr. Henry Flores  
University of Houston  
2304 West Main Street  
Houston, TX 77098

A summary of this expert's qualifications as well as their opinions and analysis have been provided in attached report marked as Exhibit "C" which was served on all counsel of record on November 2, 2022.

## II. Non-Retained Expert Witnesses

Plaintiffs hereby designate and states that they intend to call for the purpose of fact and/or opinion testimony those persons listed in the witness disclosures of each party, as appropriate. Plaintiffs make this designation without conceding the qualifications, relevancy, reliability or admissibility of such witness' opinions.

Without limitation of the foregoing, Plaintiffs hereby designate the following persons:

1. Matt Barreto, Ph.D.  
University of California, Los Angeles  
3250 Public Affairs Building  
Los Angeles, CA 90065  
barretom@ucla.edu  
909-489-2955

Dr. Barreto will testify regarding the racially polarized voting analysis that he provided to Commissioners Walkinshaw and Simms during the 2021 Washington

Redistricting Commission process. This report was publicly made available here:  
<https://senatedemocrats.wa.gov/wp-content/uploads/2021/10/Barreto-WA-Redistricting-Public-Version.pdf>

Dr. Barreto will testify to the facts and underlying information contained in this analysis and other versions of this analysis that was provided to the Washington Redistricting Commissioners and has been disclosed in discovery. Dr. Barreto will testify to the analysis and opinions he provided members of the Washington redistricting commission. In addition, he will testify to the conversations and events he participated in during the activities of the Washington Redistricting Commission.

### III. Additional Designation

Plaintiffs hereby cross designate and state that Plaintiffs may call any expert witness identified or designated by any party or any employee or representative of any party, subject to any objections that Plaintiffs may make concerning the designation or qualifications of those witnesses.

Plaintiffs reserve the right to elicit by way of cross examination, opinion testimony from experts or representatives or other witnesses who may be qualified to render expert testimony designated and/or called by other parties to the suit.

Plaintiffs reserve the right to elicit by way or direction/cross examination, opinion testimony from fact witnesses who may be qualified to render expert testimony, but are not retained or designated experts at this time and who have expertise in certain areas regarding the facts of this case. Such non-retained expert witnesses may be employees of the State of Washington, a county in Washington or another governmental unit but they have not been employed for the purpose of providing expert testimony.

Plaintiffs reserve the right to elicit by way of direct/cross examination, opinion testimony for experts designated and/or called by other parties to the suit.

Plaintiffs reserve the right to supplement this designation as necessary and to solicit opinion testimony from such persons as appropriate during both discovery and trial.

Plaintiff designates and reserves the right to call any expert designated by Defendants or Intervenor-Defendants and/or called by Defendants and/or Intervenor Defendants at hearing or trial.

Respectfully submitted,

Dated: November 4, 2022

By: /s/ Edwardo Morfin

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**CERTIFICATE OF SERVICE**

I certify that all counsel of record were served a copy of the foregoing this 4th Day of November 2022 via the Court's CM/ECF system.

/s/ Edwardo Morfin

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